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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION

MICHAEL KINGEN & KELLEY
RAMSEY, individually, and on behalf of
all others similarly situated,

Plaintiff,
vs.

WARNER NORCROSS + JUDD LLP,
and DOES 1 through 100, inclusive,
Defendants.

Case No. 2:22-CV-01374-APG-BNW

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
RE: TRANSFER OF VENUE TO THE
WESTERN DISTRICT OF MICHIGAN**

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The parties, Representative Plaintiff Michael Kingen and Representative Plaintiff Kelley Ramsey (“Representative Plaintiffs”), and Defendant Warner Norcross + Judd LLP (“Defendant”), acting through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Defendant’s principal place of business is located at 900 Fifth Third Center 111 Lyon St., NW, Grand Rapids, Michigan 49503 in the Western District of Michigan;

WHEREAS, Defendant filed a Motion to Dismiss to Plaintiff’s complaint for lack of personal jurisdiction;

WHEREAS, on November 1, 2022, the parties agreed to transfer this Action to the United States District Court for the Western District of Michigan;

WHEREAS, transfer of this Action to the United States District Court for the Western District of Michigan renders Defendant’s Motion to Dismiss moot, and therefore, Plaintiff will not be filing an Opposition to Defendant’s Motion to Dismiss. The parties request the hearing thereon be taken off calendar.

IT IS THEREFORE STIPULATED AND AGREED, by and between the parties hereto, through their attorneys of record, that this Action should be transferred to the United States District Court for the Western District of Michigan.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties hereto, that in agreeing to this Stipulation Defendant does not waive any rights and/or defenses it has or may assert in this matter.

IT IS SO STIPULATED.

Dated: November 2, 2022

COLE & VAN NOTE

By: /s/ Scott Edward Cole
Attorneys for Representative Plaintiffs

1 Dated: November 2, 2022

WOOD, SMITH, HENNING & BERMAN LLP


2
3 By: /s/ Janice M. Michaels
4 Attorneys for Defendant

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6 **ORDER**

7 The parties having so stipulated, IT IS HEREBY ORDERED that transfer to the United
8 States District Court for the Western District of Michigan is granted and the hearing on
9 Defendant's Motion to Dismiss is vacated.

10 **IT IS SO ORDERED.**

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13 Dated: November 3, 2022

14 
15
16 Honorable Andrew P. Gordon

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